

Operator Qualification Program

- All Operators should have their written OQ
 Plan prepared by April 27, 2001.
- Operators had until October 28, 2002, to be in compliance with the implementation of the OQ Plan.
- CSFM had until December 2005 to inspect all Operator Qualification Programs.



- **♦** At the end of 2005, the situation was as follows:
 - 41 Operators are under CSFM Jurisdiction, all were inspected by end of December 2005, either by CSFM, DOT or jointly:
 - 10 Operators were inspected only by DOT, which represents 24%
 - 19 Operators were inspected by CSFM, which represents 46%
 - 12 Operators were inspected jointly by CSFM and DOT, which represents 30%



- **♦** Summarizing:
 - SFM participated in 24 of the 41 OQ inspections which represents 59%



- ♦ The OQ Program Inspection included:
 - Anticipate revision of the OQ Plan,
 - OQ Program Inspection for each Operator, following DOT OQ Protocol Check List, for small / large Operators, in a meeting setting,
 - Inspection of the OQ Records,
 - OQ Field inspection, using DOT OQ Protocol9 Check List



- ♦ At this point in time,
 - None of the 41 operators, inspected were in total compliance with OQ regulations.
 - All Operators should be finishing making corrections to their Operator Qualification Program and Qualification Records.
 - Follow-up for the OQ Program Inspections are scheduled during 2006.
 - OQ Field inspection, using DOT OQ
 Protocol 9 check list will be conducted on a random basis in 2006.



Summary Statistics: CA IntrastateOQ Protocol Summary Statistics

Pro tocol	Question Name	No Issue	Potent ial Issues	% PI	N/ A	Not Insp	Total
1.01	Application and Customization of 'Off-the-Shelf Programs'	15	9	37%			24
1.02	Contractor Qualification	13	11	45.8 %			24
1.03	Management of Other Entities Performing Covered Tasks	11	6	25%	7		24
1.04	Training Requirements (Initial Qualification, Remedial, and Reevaluation)	13	11	45.8 %			24
1.05	Written Qualification Program (meet deadline)	12	12	50%			24



Summary Statistics: Cont.

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A Market Control of	2.01	Development of Covered Task List	12	12	50%			24
WARPACHER STREET	2.02	Evaluation Methods (Demonstration of Knowledge, Skill and Ability)	11	13	54.2 %			24
	2.03	Planning for Mergers and Acquisitions	2	7	63.6 %		2	11
	3.01	Development and Documentation of Evaluation and Qualification for Individuals Performing Covered Task	13	11	45.8 %			24
	3.02	Covered Task Performed by Non-Qualified Individual	12	12	50%			24



Summary Statistics: Cont.

Pro tocol	Question Name	No Issue	Potent ial Issues	% PI	N/ A	Not Insp	Total
4.01	Role of, and Approach to 'Work Performance History Review'	10	10	41.7 %	3	1	24
4.02	Evaluation of Individual's Capability to Recognize and React to AOCs	11	13	54.2 %			24
5.01	Personnel Performance Monitoring Personnel qualification	19	5	20.8			24
5.02	Reevaluation Interval and Methodology for Determining the Reevaluation Interval	15	9	37.5 %			24
6.01	Monitor Program Performance and Seek Improvement	15	9	37.5 %			24



Summary Statistics: Cont.

Pro tocol	Question Name	No Issue	Potent ial Issues	% PI	N/ A	Not Insp	Total
7.01	Maintain Program Records	12	12	50%			24
8.01	Management of Changes (to Procedures, Tools, Standards, etc.)	14	10	41.7 %			24
8.02	Notification of Significant Program Changes	2	7	63.6		2	24
	Grand Totals:	212	179		10	5	



Follow up Program Inspection:

- Will focus on the:
 - Compliance of the OQ Plan with Title 49,
 Part 195, Subpart G, including
 Implementation of the OQ Plan
 - correcting all the finding, "Potential Issues", noted during previous inspections,
 - Records inspection for the qualification of all of the persons performing Covered Tasks including appropriateness of the methods used to evaluate and qualified the persons performing covered tasks



Our focus during Field Inspection

◆ 1) If the qualified individuals perform the observed covered tasks in accordance with the operator's or contractor's approved procedures, qualification evaluation process, and/or the manufacturer's instructions.



• 2) If the individuals performing covered tasks are currently qualified to perform the tasks



♦3) If the individuals performing covered tasks has knowledge of the AOCs that are applicable to the tasks observed.



4) If qualification records verified at the job site are current, and if personal identification of contractor individuals performing covered tasks is checked, prior to task performance



♦5) If the potential issues identified by the headquarters inspection process have been corrected



Conclusive Word

- We wont your OQ Plan and the Implementation of the OQ Plan to be in Compliance with Title 49, Part 195, Subpart G, at all time.
- If you have any questions regarding the OQ requirements, please call us at:
 - Telephone Number for CSFM Office in Lakewood is (562) 497-9100
 - Pipeline Safety Engineer P.E. Adriana Crasnean.